

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**LA UNION DEL PUEBLO ENTERO, et al.** §  
*Plaintiffs,* §  
§  
v. § **Case No: 5:21-cv-844-XR**

**GREGORY ABBOTT, et al.** §  
*Defendants* §

**JOHN SCOTT, in his official capacity** §  
**as Texas Secretary of State, et al** §  
***Defendants.*** §

**DEFENDANT YVONNE RAMÓN'S DESIGNATION  
OF POTENTIAL TESTIFYING EXPERTS**

Pursuant to the Court's November 18, 2021 Scheduling Order (ECF No. 125), Defendant Yvonne Ramón, by and through her undersigned attorneys, hereby submits this Designation of Potential Testifying Experts. Defendant Ramón reserves the right to designate and call additional or different witnesses based upon further discovery, any Court pretrial rulings, or evidence presented at trial, including rebuttal witnesses. Defendant Ramón further reserves the right to call any witnesses identified by Plaintiffs, Co-Defendants or Intervenors on any of their potential or final witness lists.

## I. Potential Testifying Experts

Josephine Ramirez Solis  
Leigh Ann Tognetti

Hidalgo County Criminal District Attorney's Office  
100 E. Cano St.  
Edinburg, TX 78539  
(956) 292-7609

Ms. Ramirez and Ms. Tognetti may present testimony regarding attorneys' fees in this matter.

The parties have not yet completed discovery in this case. Defendant Ramón therefore reserves the right to supplement this Designation pursuant to the Court's Scheduling Order and the Federal Rules of Civil Procedure if additional witnesses and/or documents are identified during discovery.

Respectfully submitted,

RICARDO RODRIGUEZ, JR.  
CRIMINAL DISTRICT ATTORNEY  
HIDALGO COUNTY, TEXAS

/s/ Josephine Ramirez-Solis  
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ATTORNEY FOR DEFENDANT  
YVONNE RAMÓN

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of March, 2022, I electronically submitted the above with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the all parties and counsel of record

*/s/ Josephine Ramirez-Solis*  
Josephine Ramirez-Solis  
Assistant District Attorney